United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

IN REPLY REFER TO:

April 23, 2002

ER 02/165

Mr. Robert Beraud
BPA Communications Office KC-7
P.O. Box 12999
Portland, OR 97212

Subject: **COMMENTS** – Review of Draft Environmental Impact Statement for the Wallula Power Project and the Wallula-McNary Transmission Line Project, DOE/EIS-0330, Walla Walla, Washington

Dear Mr. Beraud,

On April 16, 2002, the Department of the Interior submitted comments on the subject draft environmental impact statement for the proposed Wallula Power Project and the Wallula-McNary Transmission Line Project, DOE/EIS-0330, Walla Walla County, Washington (copy attached). After submitting those comments I received the following comments from the National Park Service. Please consider these part of the Department's comments.

GENERAL COMMENTS

The National Park Service (NPS) is seriously concerned about the cumulative impacts to air quality and views as more and more energy generation facilities are constructed and operated in the Northwest. We are concerned about potential effects on units of the National Park System (including Class I airsheds), as well as concerned about potential indirect effects on nationally significant geologic resources close to the proposed Wallula Power Project. 29-1

SPECIFIC COMMENTS

Whitman Mission National Historic Site
Oregon National Historic Trail
Lewis and Clark National Historic Trail

Whitman Mission National Historic Site is a unit of the National Park System located in Walla Walla, Washington. Marcus and Narcissa Whitman founded their mission among the Cayuse and Waiilatpu Indians in 1836. In 1843 and 1844 Oregon Trail emigrants stopped at the mission for rest and supplies; the main Oregon Trail bypassed the mission after 1844. Portions of the water route of the Lewis and Clark National Historic Trail follow the Snake and Columbia 29-2

Rivers through the area addressed by this DEIS. Whitman Mission National Historic Site does not carry "Class I" air quality restrictions, and neither does the Oregon National Historic Trail or the Lewis and Clark National Historic Trail. It is, however, worth considering that increased haze and, to some extent related project facilities in the area, would alter the historic landscapes of these nationally significant historic resources. Based on Figures 3.17-2 and 3.17-3 it appears that the cumulative impacts to visibility in the Walla Walla area would be significant, although it is difficult to interpret the figures since there is no key to indicate what the colors show. 29-2 contd

NPS Class I Areas

Mount Rainier, North Cascades and Olympic National Parks are Class I areas, and we are concerned about the cumulative impacts of as many as 45 new power plants on the air quality in NPS "Class I" areas. The cumulative impact modeling analysis predicts that the cumulative effects of emissions from the Wallula project and other proposed projects would have significant visibility impacts at Mount Rainier National Park. In addition, the amount of nitrogen deposited in the park is expected to increase, potentially harming other natural resources. 29-3

The ability to see – and see clearly – the spectacular scenery contained in these three national parks is very important to the public and to the fundamental purpose of these parks. The view of Mount Rainier, the icon of the Pacific Northwest, and other park mountains affects millions of people throughout the Puget Sound area. People in the region understand that natural weather patterns can reduce visibility, but they are less understanding when anthropogenic pollution takes away the color, detail, and ultimately the features of the natural scenery.

Monitoring and research demonstrates that visibility is already impaired by pollution throughout the region. The NPS has been working closely with western states and stakeholders to develop strategies for achieving incremental improvements in visibility over the short term and restoring natural visibility over the long term, consistent with NPS legislative mandates and the Clean Air Act's visibility protection requirements. The cumulative analysis of potential impacts from the proposed new facilities predicts that there will be 40 days at Mount Rainier National Park, 24 days at North Cascades National Park, and 36 days at Olympic National Park when there would be a perceptible effect on visibility, i.e., greater than 5% change in extinction on the clearest days. The analysis also shows that there will be 12 days at Mount Rainier, 2 days at North Cascades, and 10 days at Olympic when the change in background visibility would be greater than 10%. 29-4

Generally, the NPS considers visibility impacts as significant if an individual source's impact exceeds a 5% change in extinction, and such impacts as adverse if the cumulative change in extinction exceeds 10%. If there are visibility impacts greater than a 10% change, we determine whether or not those impacts are adverse based on the frequency, magnitude, and duration of the impacts. Based on the information we have reviewed, we believe that the cumulative emissions from the 45 proposed facilities would adversely impact visibility at Mount Rainier, North Cascades, and Olympic.

We are also concerned about acidic deposition resulting from the proposed facilities' emissions. Nonmarine sulfate and hydrogen ion concentrations in precipitation for at least portions of the Washington Cascades are slightly elevated above background conditions. The cumulative 29-5

analysis predicts annual nitrogen deposition will be 0.016 kg/ha/yr at Olympic National Park, 0.018 kg/ha/yr at Mount Rainier National Park, and 0.027 kg/ha/yr at North Cascades National Park. Because one of our primary management objectives is to maintain natural conditions, we are concerned about total sulfur and nitrogen deposition when a single source contributes greater than 0.005 kg/ha/yr of either pollutant. 29-5 contd

We recommend that whatever approach BPA and the Energy Facility Site Evaluation Council (EFSEC) ultimately adopt, potential emissions growth from the new facilities together with existing and other permitted emissions should be limited to levels that would not create a cumulative visibility impact at any one of the NPS areas greater than a 10% change in background extinction. If cumulative effects attain a 10% change in background extinction, new facilities that exceed a 0.4% change in background extinction would be required to mitigate their impact further (*e.g.*, by acquiring emission offsets from other facilities in the area). 29-6

Wallula Gap

Wallula Gap is a National Natural Landmark, and it is one of the geologic features associated with the Ice Age Floods. The National Natural Landmark is designated for its geologic features, and the project appears unlikely to have any direct impact on those features. The NPS has studied the known Ice Age Floods sites in the Northwest, and the recent report to Congress identified the potential for linking these sites in an Ice Age Floods National Geologic Trail. Although the NPS does not have any land jurisdiction in this area, we would like the BPA and EFSEC to be aware of the recreational and educational value of Wallula Gap and hope they take these values into consideration as they consider the impact of diminished air quality and visual intrusions in this vicinity. 29-7

I appreciate your cooperation in this matter.

Sincerely,

Preston A. Sleeger
Regional Environmental Officer

Responses to Comment Submission 29,
Letter from Preston A. Sleeger, U.S. Department of the Interior,
Office of Environmental Policy and Compliance

29-1. Sections 3.2 and 3.17 describe the modeled air quality impacts caused by the Wallula power plant and other proposed power plants in the region. See Chapter 3 of this Final EIS.

29-2. The referenced historic sites have been specified as PSD Class II regions under EPA regulations. EFSEC's draft PSD permit (described in Section 3.2 of this Final EIS) concludes the applicant has satisfied all EPA regulations regarding air pollutant impacts to Class II areas.

29-3. Please see response to comment 29-4 below.

29-4. Section 3.2 has been updated to more fully describe existing visibility degradation in the region caused by existing sources. Please see Chapter 3 of this Final EIS for updated text. The frequency of visibility impacts referred to in this comment is based on Bonneville's worst-case Phase I study that modeled 45 new power plants. A more realistic case is the "7000 MW Baseline Source Group" described in Tables 3.17-10 and 3.17-11 of the Draft EIS. The modeled impacts for the 7000 MW Baseline Group are much lower.

29-5. Although the referenced Deposition Analysis Thresholds (DATs) have been adopted by the FLAG federal land managers as a "level of concern" indicator, they do not constitute federally enforceable air quality limits. Therefore, the modeled deposition rates have not been compared to the DATs. EFSEC utilized only federal regulatory limits and procedures mandated by the PSD regulations to assess air quality impacts and to develop emission control requirements for the Wallula power plant.

29-6. Please see response to comment 16-1.

29-7. Please see response to comment 29-2.